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April 23, 2021

VIA ECF

Honorable Lois Bloom, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: Crowell-Converse v. Staten Island Aid for
Retarded Children et al.
Case No. 1:20-cv-00637 (ENV) (LB)**

Dear Judge Bloom:

We represent the Defendants in connection with the above-referenced case and submit this letter jointly with Plaintiffs' counsel. We write pursuant to Your Honor's February 3, 2021 Order to provide the Court with a status report.

Defendants:

On February 3, 2021, the Court approved of the parties' proposed Notice of Lawsuit. Thereafter, on February 22, 2021 the Notices were sent out by Plaintiffs' counsel to all of the putative collective members. To date, two Consents to Join Lawsuit have been filed with the Court and thus along with the one named Plaintiff there currently are three Plaintiffs. The deadline to return the Consent to Join Lawsuit is today, April 23, 2021. Pursuant to the Court's August 6, 2020 Order in FLSA Case Requiring Discovery (ECF Docket # 17), the parties previously exchanged documents/information for the named Plaintiff and will exchange such documents/information as provided for in the Order for the two opt-in Plaintiffs over the course of the next thirty (30) days. Thereafter, Defendants propose scheduling a mediation through the Court's mediation program or a settlement conference with Your Honor to take place in mid to late June 2021. Defendants note that they did not participate in the preparation of Exhibit A attached hereto and believe that submission of a Joint Discovery Planning Report at this time is premature.

Plaintiffs:

Plaintiffs do not believe a mediation at this time is appropriate given that other individuals have come forward to support Plaintiff's class claims, any mediation at this time would be

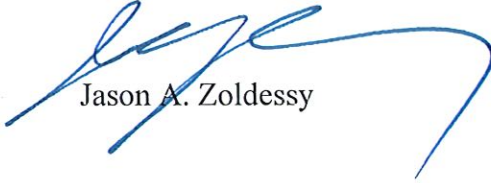
premature. Additional discovery will help explore the strength of the parties positions and would be appropriate prior to expending resources for a mediation. To the extent the court believes that a mediation at this point would be appropriate, Plaintiff would agree to utilize an EDNY panel member.

Therefore, Plaintiff now respectfully request that the Court permit the parties to proceed with discovery and move forward with the proposed Joint Discovery Planning Report, attached as **Exhibit A**.

We thank the Court for its consideration in this regard.

Respectfully submitted,

JACKSON LEWIS P.C.



Jason A. Zoldessy

Attachment

cc: All Counsel (Via ECF)